UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

BRIAN WATSON, DANIEL SAMARGHITAN, ANNMARIE GREENE f/k/a ANNMARIE MOHAMMED, JOSE ESPINAL, and LYMELL JACKSON, individually and on behalf of all others similarly situated,

Plaintiffs,

VS.

MANHATTAN LUXURY AUTOMOBILES, INC. d/b/a LEXUS OF MANHATTAN,

Defendant.

Civil Action Nos. 1:20-cv-04572 1:21-cv-01588

NOTICE OF DEFENDANT'S MOTION FOR COSTS

PLEASE TAKE NOTICE that upon the annexed declaration of Jason M. Myers dated December 29, 2021 with supporting exhibits, Defendant Manhattan Luxury Automobiles Inc. d/b/a Lexus of Manhattan, will move this Court on a date to be set by the Court or as soon thereafter as counsel can be heard, before the Hon. Magistrate Judge Sarah L. Cave, United Sates Courthouse for the Southern District of New York, 500 Pearl Street, Courtroom 18A, New York, New York for an Order granting reimbursement in the amount of \$33,648.53 for the reasonable costs and expenses incurred to rebut the Supplemental and Rebuttal Report dated September 2, 2021 of Anya Verkovskaya as directed in Judge Cave's Order dated October 19, 2021 (Doc. No. 126); and granting such other, further and different relief as this Court deems just and proper.

Dated: New York, New York December 29, 2021

{N2048770.1 }

Respectfully submitted,

LONDON FISCHER LLP

By:

Jason M. Myers, Esq.

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